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F. #2016R01892

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

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UNITED STATES OF AMERICA

INDICTMENT

CR 17- 00024

- against -

Cr. No. _____
(T. 42, U.S.C., § 408(a)(8); T. 18, U.S.C.,
§§ 371, 1028(a)(7), 1028(b)(1)(D),
1028(b)(2)(A), 1028(c)(3)(A), 1028(f),
1028A(a)(1), 1028A(b), 1028A(c)(11), 2 and
3551 et seq.)

SHARON COFFEE-DEAN,

Defendant.

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THE GRAND JURY CHARGES:

MAUSKOPF, J.

KUO, M.J.

INTRODUCTION

At all times relevant to this Indictment:

1. The defendant SHARON COFFEE-DEAN was a resident of Queens, New York. From on or about November 18, 1985, through on or about July 31, 2015, COFFEE-DEAN was employed by the Social Security Administration (“SSA”).

2. The SSA was an agency of the U.S. government, responsible for maintaining records in compliance with the Privacy Act of 1974, assigning Social Security numbers, and administering Social Security programs consisting of retirement benefits, survivors’ benefits, and disability benefits for the aged, blind and disabled. The Privacy Act protects citizens against unwarranted invasions of privacy stemming from government agencies’ collection, maintenance, use and dissemination of personal information about individuals.

3. Personal Identifying Information (“PII”) is information that either alone or in combination with other information can be used to uniquely identify, contact, or locate a

person. PII includes, but is not limited to, names, addresses, Social Security numbers, and dates of birth.

4. By virtue of her employment with the SSA, the defendant SHARON COFFEE-DEAN had access to records of PII, which were records maintained and kept within the normal course of business by the SSA. Between December 2011 and January 2012, the defendant SHARON COFFEE-DEAN accessed approximately 41 SSA agency records, and copied portions of those records, including Social Security numbers and dates of birth, for those individuals. COFFEE-DEAN then sold those Social Security numbers and dates of birth to individuals whose identities are known to the Grand Jury, in exchange for compensation.

COUNT ONE
(Conspiracy)

5. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

6. In or about and between December 2011 and January 2012, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SHARON COFFEE-DEAN, together with others, did knowingly and intentionally conspire to defraud the United States and any agency thereof, to wit: the Social Security Administration, for the purpose of impeding, impairing, obstructing, and defeating the lawful government functions of the Social Security Administration, to wit: to insure the security and confidentiality of records and to protect against any anticipated threats and hazards to their security and integrity which could result in substantial harm, embarrassment, inconvenience, and unfairness to any individual on whom information is maintained, as set forth in Title 5, United States Code, Section 552a(e)(10).

7. In furtherance of the conspiracy and to affect its objects, within the Eastern District of New York and elsewhere, the defendant SHARON COFFEE-DEAN, together with others, did commit and cause to be committed the following:

OVERT ACTS

a. On or about and between December 30, 2011 and January 19, 2012, the defendant SHARON COFFEE-DEAN retrieved approximately 41 SSA agency records, which included Social Security numbers and dates of birth.

b. On or about and between December 30, 2011 and January 19, 2012, the defendant SHARON COFFEE-DEAN copied SSA records, including Social Security numbers and dates of birth, for approximately 41 individuals.

c. On or about and between December 30, 2011 and January 19, 2012, the defendant SHARON COFFEE-DEAN sold Social Security numbers and dates of birth obtained from or verified by SSA records to individuals whose identities are known to the Grand Jury.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO

(Conspiracy to Traffic in Means of Identification)

8. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

9. In or about and between December 2011 and January 2012, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SHARON COFFEE-DEAN, together with others, did knowingly and intentionally conspire to traffic in one or more means of identification, to wit: Social Security numbers and

dates of birth, in and affecting interstate and foreign commerce, contrary to Title 18, United States Code, Sections 1028(a)(8) and 1028(c)(3)(A).

(Title 18, United States Code, Sections 1028(f), 1028(b)(2)(A) and 3551 et seq.)

COUNT THREE

(Fraud and Related Activity in Connection with Means of Identification)

10. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

11. On or about January 19, 2012, within the Eastern District of New York, the defendant SHARON COFFEE-DEAN, together with others, did knowingly and intentionally transfer, possess and use, without lawful authority, a means of identification of another person, to wit: Jane Doe, an individual whose identity is known to the Grand Jury, with the intent to commit, and to aid or abet, and in connection with, any unlawful activity that constitutes a violation of Federal law, to wit: Title 5, United States Code, Section 552a(i)(1), in and affecting interstate and foreign commerce, and, as a result of the offense, obtain things of value aggregating \$1,000 or more during a one-year period.

(Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1)(D), 1028(c)(3)(A), 2 and 3551 et seq.)

COUNT FOUR

(Fraud and Related Activity in Connection with Means of Identification)

12. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

13. On or about January 19, 2012, within the Eastern District of New York, the defendant SHARON COFFEE-DEAN, together with others, did knowingly and intentionally transfer, possess and use, without lawful authority, a means of identification of another person, to

wit: John Doe, an individual whose identity is known to the Grand Jury, with the intent to commit, and to aid or abet, and in connection with, any unlawful activity that constitutes a violation of Federal law, to wit: Title 5, United States Code, Section 552a(i)(1), in and affecting interstate and foreign commerce, and, as a result of the offense, obtain things of value aggregating \$1,000 or more during a one-year period.

(Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1)(D), 1028(c)(3)(A), 2 and 3551 et seq.)

COUNT FIVE
(Misuse of a Social Security Number)

14. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

15. On or about January 19, 2012, within the Eastern District of New York, the defendant SHARON COFFEE-DEAN, together with others, did knowingly and intentionally disclose, use and compel the disclosure of the Social Security number of Jane Doe, in violation of Title 5, United States Code, Section 552a(i)(1).

(Title 42, United States Code, Section 408(a)(8); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SIX
(Misuse of a Social Security Number)

16. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

17. On or about January 19, 2012, within the Eastern District of New York, the defendant SHARON COFFEE-DEAN, together with others, did knowingly and intentionally

disclose, use and compel the disclosure of the Social Security number of John Doe, in violation of Title 5, United States Code, Section 552a(i)(1).

(Title 42, United States Code, Section 408(a)(8); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SEVEN
(Aggravated Identity Theft)

18. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

19. On or about January 19, 2012, within the Eastern District of New York, the defendant SHARON COFFEE-DEAN, together with others, during and in relation to the crime charged in Count Five, did knowingly and intentionally transfer, possess and use, without lawful authority, one or more means of identification of another person, to wit: Jane Doe, knowing that the means of identification belonged to another person.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), 1028A(c)(11), 2 and 3551 et seq.)

COUNT EIGHT
(Aggravated Identity Theft)

20. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

21. On or about January 19, 2012, within the Eastern District of New York, the defendant SHARON COFFEE-DEAN, together with others, during and in relation to the crime charged in Count Six, did knowingly and intentionally transfer, possess and use, without

lawful authority, one or more means of identification of another person, to wit: John Doe,
knowing that the means of identification belonged to another person.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), 1028A(c)(11), 2
and 3551 et seq.)

A TRUE BILL



FOREPERSON



ROBERT L. CAPERS
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

